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REMARKS

In response to the non-final office action of November 1, 2006, applicants ask that all claims be allowed in view of the amendment to the claims and the following remarks.

Claims 1-31 are now pending, of which claims 1, 16, 25, and 26 are independent. Claims 1-26 have been amended and claims 27-31 have been added. Support for these amendments and new claims may be found in the application at, for example, page 17, line 27 through page 34, line 10 referring to Figs. 7-13. No new matter has been introduced.

Claims 1-26 have been rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 1-26 have been amended to address the Examiner's concerns.

In particular, claims 1-26 have been amended to recite a computer readable medium (claims 1-24) or an apparatus (claims 25 and 26) comprising "executable instructions that, when executed, perform operations." Applicants submit that the operations performed by the executable instructions, when executed, produce a useful, concrete, and tangible result and that a computer readable medium or an apparatus comprising executable instructions that, when executed, produce a useful, concrete, and tangible result is statutory subject matter. *See, e.g., In re Beauregard*, 53 F.3d 1583, 1584 (Fed. Cir. 1995); *AT&T Corp. v. Excel Comm. Inc.*, 172 F.3d 1352 (Fed. Cir. 1999). Accordingly, applicants submit that independent claims 1, 21 and 27 each recite statutory subject matter. Therefore, applicants respectfully request reconsideration and withdrawal of the rejection.

Claims 1-26 also have been rejected as being anticipated by Griffin (U.S. Patent Application No. 2002/0178119). Applicants request reconsideration and withdrawal of this rejection because Griffin does not describe or suggest the subject matter of independent claims 1, 16, 25, and 26, as described below.

As amended, independent claim 1 recites a computer-readable storage medium that includes a data repository and executable instructions that, when executed, perform operations. The data repository includes access control group data including access group entries, user access data including user access data entries, and data object access data including data object access data entries. An access group entry identifies an access control group, a user access entry

relates to at least one entry in the access control group data and identifies a user and an access control group, and a data object access data entry relates to at least one entry in the access control group data and identifies a data object and an access control group. The operations performed by the executable instructions include receiving an indication of a user and receiving an indication of a data object. The operations also include searching the user access data to identify a user access data entry that identifies the indicated user and searching data object access data to identify a data object access data entry that identifies the indicated data object. The operations further include comparing an access control group identified by the identified user access data entry with an access control group identified by the identified data object access entry. The operations also include enabling the indicated user to access the indicated data object conditioned on the access control group identified by the identified user access data entry being the same access control group as the access control group identified by the identified data object access data entry.

Griffin does not describe or suggest comparing an access control group identified by the identified user access data entry with an access control group identified by the identified data object access entry and enabling the indicated user to access the indicated data object conditioned on the access control group identified by the identified user access data entry being the same access control group as the access control group identified by the identified data object access data entry, as recited in amended independent claim 1.

In contrast, Griffin is directed to a system for managing access to resources with a role-based access control model. See Griffin at paragraph [0018]. In particular, the system assigns a role to a user by matching attributes of the user with a role filter associated with the role. See Griffin at paragraph [0038]. The role includes a set of one or more capabilities that define access to a specific set of resources. Id. Each capability includes one or more access conditions that include one or more rights that define access criteria for the resources associated with the capability. See Griffin at paragraph [0041]. When the user attempts to access a resource, the system accesses the role associated with the user, determines whether a capability included in the

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role defines access to the resource, and allows the user to access the resource if the access criteria defined by the capability is met. See Griffin at paragraphs [0038], [0041], and [0047].

The system of Griffin does not enable a user to access a data object by comparing an access control group identified by a user access data entry identified for the user with an access control group identified by a data object access data entry identified for the data object. Rather, the system of Griffin enables a user to access a resource by accessing a role for the user and determining whether access criteria included in a capability of the role for the resource allows access. Nothing in Griffin describes or suggests comparing an access control group identified by a user access data entry identified for the user with an access control group identified by a resource data entry identified for the resource to enable the user to access the resource.

Accordingly, Griffin does not describe or suggest comparing an access control group identified by the identified user access data entry with an access control group identified by the identified data object access entry and enabling the indicated user to access the indicated data object conditioned on the access control group identified by the identified user access data entry being the same access control group as the access control group identified by the identified data object access data entry, as recited in amended independent claim 1. Therefore, for at least these reasons, applicants request reconsideration and withdrawal of the rejection of claim 1 and its dependent claims 2-15.

Independent claim 25 recites features similar to those discussed above with respect to claim 1, and does so in the context of an apparatus. Accordingly, for the reasons discussed above with respect to claim 1, applicants request reconsideration and withdrawal of the rejection of independent claim 25.

As amended, independent claim 16 recites a computer-readable storage medium that includes a data repository and executable instructions that, when executed, perform operations. The data repository includes access control rule data including access control rule entries and characteristic method data including characteristic method data entries. An access control rule entry identifies a characteristic method data entry and a characteristic method data entry relates to at least one entry in the access control rule data and identifies a method to determine a

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characteristic for a user and a method to determine the characteristic for a data object. The operations include receiving an indication of a user and receiving an indication of a data object. The operations also include accessing an access control rule data entry identifying a characteristic method data entry and accessing the characteristic method data entry identified by the access control rule data entry. The characteristic method data entry identifies a method to determine a characteristic for a user and identifies a method to determine the characteristic for a data object. The operations further include determining the characteristic for the user by performing the method to determine the characteristic for the user identified by the characteristic method data structure and determining the characteristic for the data object by performing the method to determine the characteristic for the data object identified by the characteristic method data structure. The operations also include generating access control information that permits the user to access the data object conditioned on the characteristic for the user being the same as the characteristic for the data object.

Griffin does not describe or suggest determining the characteristic for the user by performing the method to determine the characteristic for the user identified by the characteristic method data structure, determining the characteristic for the data object by performing the method to determine the characteristic for the data object identified by the characteristic method data structure, and generating access control information that permits the user to access the data object conditioned on the characteristic for the user being the same as the characteristic for the data object, as recited in amended independent claim 16.

In contrast, the system of Griffin generates access control information by associating users with roles and resources with capabilities. See Griffin at paragraph [0038]. In particular, the system associates a user with a role by comparing attributes of the user with a role filter and associates a resource with a capability by comparing attributes of the resource with a capability filter. See Griffin at paragraph [0048]. Associating a user with a role and associating a resource with a capability provides access control because the roles and capabilities have a pre-defined access relationship (e.g., a role is composed of a set of one or more capabilities). See Griffin at paragraph [0038]. The system of Griffin does not determine a characteristic for a user and a

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characteristic for a data object by performing methods identified by a characteristic method data entry and generate access control information conditioned on the characteristic for the user being the same as the characteristic for the data object. Rather, the system of Griffin determines attributes of users or resources and compares them with filters without performing a method identified by a characteristic method data entry and generates access control information separately for users and resources without determining whether a characteristic for the user is the same as a characteristic for the resource.

Accordingly, Griffin fails to describe or suggest determining the characteristic for the user by performing the method to determine the characteristic for the user identified by the characteristic method data structure, determining the characteristic for the data object by performing the method to determine the characteristic for the data object identified by the characteristic method data structure, and generating access control information that permits the user to access the data object conditioned on the characteristic for the user being the same as the characteristic for the data object, as recited in amended independent claim 16. Therefore, for at least these reasons, applicants request reconsideration and withdrawal of the rejection of claim 16 and its dependent claims 17-24.

Independent claim 26 recites features similar to those discussed above with respect to claim 16, and does so in the context of an apparatus. Accordingly, for the reasons discussed above with respect to claim 1, applicants request reconsideration and withdrawal of the rejection of independent claim 26.

New claims 27-31 each depend directly or indirectly from independent claim 16. At least for the reason of that dependency and the reasons noted above with respect to independent claim 16, applicants submit that claims 27-31 are allowable.

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as an intent to

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concede any issue with regard to any claim, except as specifically stated in this reply, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants submit that all claims are in condition for allowance.

Pursuant to 37 CFR §1.136, applicants hereby petition that the period for response to the action dated November 1, 2006, be extended for one month to and including March 1, 2007.

The fee in the amount of $370.00 in payment of the excess claim fees ($250) and the one-month extension of time fee ($120) is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 2/8/07

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